

Rahul Manchanda (Pro Se)
270 Victory Boulevard
New Rochelle, NY 10804
Tel: (646) 645-0993
Email: rahul.manchanda.new.york@gmail.com

January 23, 2025

VIA U.S. MAIL AND HAND DELIVERY

Judge Sean Lane
Southern District of New York - Bankruptcy Court
300 Quarropas Street
White Plains, New York 10601

RE: Case Index Nos 23-22095 and 23-11805
Adv. Proc. Nos. 24-7009 and 24-7010
Debtor Letter Motion to Exclude

Judge Lane:

In 2023, both AUSA Dana Walsh Kumar's and AUST Gregory Zipes's Discovery Requests for both bankruptcy cases and adversary proceedings listed above, in relevant part, amongst other requests, only requested:

"2020, 2021, and 2022 Federal and State Tax Returns with all completed schedules attached, including but not limited to extensions, K-1's, 1099's, W-2's for both (a) the Debtor and (b) the Manchanda Law Office PLLC," and

"all documents relating to gifts or transfers made to or from the Debtor having a value in excess of \$100.00 for the past two years and, if documents do not exist for any such gift, a description of the item purchased and to whom such item was presented," and

"Copies of money orders, bank checks or certified checks used to pay any bills, in the 12 months preceding the Filing Date," and

"From January 1, 2020 to the present, all statements of financial accounts (including but not limited to any checking accounts, savings accounts, money market accounts and brokerage accounts) held by the Debtor personally, jointly, and/or in the name of Manchanda Law Office PLLC," and

"Copies of all banking records documenting financial transactions undertaken by the Debtor and/or Manchanda Law Offices PLLC for the year prior to the filing of the Petition, including but not limited to all document sufficient to show the source of funds used in the purchase of Debtor's home and any mortgage payments."

Now that today, January 19, 2025 we have received the big, sloppy mess from AUSA Dana Walsh Kumar representing what the equally big, sloppy mess former CPA Marc Albaum produced, in response to her "subpoena," we see sometimes illegible, unintelligible, and sometimes his hand written scraps, notes, and sheets dating as far back as 2016, 2017, 2018, 2019, and so on, far exceeding any and all scope, requests, requirements, and dates from both U.S. Department of Justice Attorneys listed above.

As per even their own limitations, we can not be expected to either remember, decipher, or validate such assorted garbage which far exceeds even their own time frames requested, with their own maximum date going back as far as "2 years before the petition filed," which would be the year 2021.

So even AUSA Dana Walsh Kumar and AUST Gregory Zipes did not either contemplate or have the audacity to demand and have undersigned Debtor validate, remember, or decipher any financial document before 2021.

Because it is quite impossible for Debtor to exceed what these two U.S. Department of Justice Attorneys even requested or wanted, we respectfully request for your Honor to expressly and explicitly exclude from the above referenced cases, any and all of the assorted irrelevant and prejudicial garbage received from CPA Marc Albaum for the years 2016, 2017, 2018, 2019, 2020, and 2021, in keeping and staying true to what even they thought was reasonable under the circumstances.

Respectfully submitted,



Rahul D. Manchanda (Pro Se)
270 Victory Boulevard
New Rochelle, NY 10804

To: AUSA Dana Walsh Kumar, 86 Chambers Street, New York NY 10007
AUST Gregory Zipes, 1 Bowling Green, New York NY 10004